

U.S. DISTRICT COURT
NORTHERN DIST. OF TX
FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

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UNITED STATES OF AMERICA

v.

TRENT GEORGE

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Criminal No.

3-14CR 003-N

FACTUAL RESUME

The defendant, Trent George, has reviewed with his attorney, Camille Knight, and acknowledges that he understands in order to establish his guilt for Count One of the information filed against him, namely: Conspiracy to Commit Theft Concerning Programs Receiving Federal Funds, 18 U.S.C. § 371 (18 U.S.C. § 666(a)(1)(A)), the government must prove each of the following elements beyond a reasonable doubt:

- First: The defendant and at least one other person made an agreement to commit the crime of theft concerning programs receiving federal funds, as charged in the information;
- Second: That the defendant knew the unlawful purpose of the agreement and joined in it willfully, that is, with the intent to further the unlawful purpose; and
- Third: That one of the conspirators during the existence of the conspiracy knowingly committed at least one of the overt acts described in the information, in order to accomplish some object or purpose of the conspiracy.

Source: Fifth Circuit Pattern Jury Instructions (Criminal Cases) (2012).

STIPULATED FACTS

Co-conspirator A was employed as the Executive Director/Manager of the Rockwall Housing Development Corporation (RHDC) between January 2010 and November 2012.

The RHDC is a landlord to several authorized public housing agencies (PHAs) in Rockwall, Texas, which is on the Dallas Division of the Northern District of Texas. These PHAs, and, in turn, the RHDC, receive federal funds from the United States Department of Housing and Urban Development (HUD) through the "Housing Choice Voucher Program." The RHDC owns and operates a 36-unit apartment complex in Rockwall, Texas, known as "the Meadows."

Between March 2010 and October 2012, the RHDC received benefits in excess of \$10,000.00 under the United States Department of Housing and Urban Development Housing Choice Voucher Program, a federal program involving a grant, contract, subsidy, loan guarantee, insurance, or other form of federal assistance.

In her role as a director of the RHDC, Co-conspirator A was an agent of the RHDC. Co-conspirator A's responsibilities included, among other things, reviewing and processing monthly housing assistance payments. This position provided her managerial discretion and responsibility for the day-to-day running of the Meadows.

Beginning in March 2010 and continuing thereafter until June 2011, Co-conspirator A knowingly and intentionally wrote approximately 128 RHDC checks, made out to Trent George, for an approximate total of \$126,063.00. Although George


performed some work for the Meadows, including watering plants and picking up trash, George did not earn and was not owed \$126,063.00 over the course of less than sixteen months. As George knew, Co-conspirator A did not have authorization from the RHDC to make the vast majority of these payments to George.

In most cases, following his receipt of the checks that were made out to him, George knowingly and intentionally visited a local financial institution and cashed the RHDC checks given to him by Co-conspirator A. George knowingly and intentionally returned the vast majority of cash to Co-conspirator A. Co-conspirator A paid George a fee for having cashed the checks for her. In many instances, Co-conspirator A, Co-conspirator B, and George knowingly and intentionally utilized the remaining cash to purchase illegal narcotics for their own personal use. Co-conspirator A did not have authorization from the RHDC to use RHDC funds for such purposes.

In January 2011, Co-conspirator B was evicted from the Meadows and began living with George in hotels in Rockwall, Texas. Co-conspirator B and George resided in hotels continuously between on or about January 27, 2011, and on or about May 24, 2011. Co-conspirator A would also occasionally stay in the room reserved for Co-conspirator B. Co-conspirator A intentionally, and without authorization from the RHDC, paid for these hotel stays using RHDC funds. Co-conspirator A, Co-conspirator B, and George often used illegal narcotics in these hotel rooms.

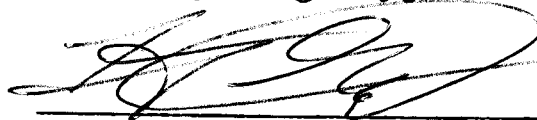
This factual resume is not intended to be a complete accounting of all the facts and events related to the offense charged in this case. The limited purpose of this statement

of facts is to demonstrate that a factual basis exists to support George's guilty plea to Count One set forth in the information.



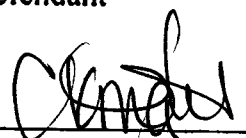
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Jan 4, 2014
Date



TRENT GEORGE
Defendant

28 DEC 13
Date



CAMILLE KNIGHT
Attorney for the Defendant

12/20/13
Date